UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

PETER A. CRAWFORD,

Plaintiff,

v.

Civil Action No. 05-cv-10078 (DPW)

WOLVERINE, PROCTOR & SCHWARTZ, INC., STEVEN F. CHILINSKI, and DEEPAK S. KULKARNI,

Defendants.

JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS TO FILE OPPOSITION TO PLAINTIFF'S CURRENTLY PENDING DISCOVERY MOTIONS

NOW COMES the Plaintiff and Defendants in the above-captioned action (collectively the "Parties") and jointly move for an order extending the time for defendants to file opposition to plaintiff's currently pending Motion to Compel Responses to Plaintiff's Request for Production of Documents, Set No. 2 and Plaintiff's Motion to Amend and Dissolve Protective Orders in Light of the Amended Complaint.

Plaintiff filed both of the above-referenced motions on February 22, 2006. Pursuant to Local Rule 7.1(B)(2), defendants' opposition to both of plaintiff's motions were due to be filed on March 8, 2006, or within fourteen days after plaintiff filed his motion. At defendants' request, plaintiff has consented to a two-day extension, until Friday, March 10, 2006, for defendants to file their opposition to plaintiff's motions.

WHEREFORE, the parties respectfully move that this Court grant the defendants a twoday extension, until Friday, March 10, 2006, to file and serve their opposition to plaintiff's currently pending discovery motions. Respectfully submitted,

PETER A. CRAWFORD, WOLVERINE, PROCTOR & SCHWARTZ,

INC.; DEEPAK S. KULKARNI and STEVEN

CHILINSKI,

Plaintiff Pro Se By their attorneys,

/s/ Peter A. Crawford 23 Newcastle Drive Nashua, New Hampshire 03060

(603) 888-4574

/s/ Jeffrey D. Kuhn Mark M. Whitney Jeffrey D. Kuhn

MORGAN, BROWN & JOY, LLP 200 State Street – 11th Floor

Boston, Massachusetts 02109-2605

(617) 523-6666

Counsel for Defendant

Dated: March 8, 2006